

**Lower Boise River Effluent Trading Demonstration Project**  
**Action Plan for Implementation Phase**  
**September 18, 2000**

The April 21, 2000 meeting of the Framework Team marks the transition from the design phase of the demonstration project to the implementation phase. The purpose of this plan is to generally outline roles and responsibilities and a time line for the next phase of the project. The plan complements the interagency agreement that identifies the responsibilities several agencies have accepted for supporting the project in the future. The plan generally describes next steps in the following areas: overall project support and completion of the TMDLs, completion of the BMP list and related work to support agriculture participation in trading, launching the association, and program reviews and audits.

*Overall Project Support*

- C DEQ will assume the lead in providing overall coordination and support for the project.  
Target Date: Ongoing
- C DEQ will complete the TMDLs for the Lower Boise River, listed tributaries and the Snake River-Hells Canyon, incorporating key elements necessary to support trading in the appropriate documents.  
Target Date: December 31, 2001
- C DEQ will draft, and conduct a public review and comment process for, the trading requirements document (regulatory vehicle for this document still under consideration). EPA will review and approve the initial document and any subsequent revisions. The document will describe the trading framework, specify the conditions and procedures for trading, and include ratios and the BMP list.  
Target Date: Draft by December 31, 2000; Final December 31, 2002; Revise every five years
- C EPA will continue to be involved by issuing NPDES permits, reviewing the TMDL when it is submitted, and supporting DEQ and the stakeholders as described in the interagency agreement.  
Target Date: Ongoing
- C The SCC will coordinate preparation and review of key elements of the BMP List (as described below), and will provide technical support to persons and organizations interested in marketing agriculture NPS reductions as described in the interagency agreement. Review of the BMP List will be provided by the state BMP Technical Committee.  
Target Date: Ongoing

- C NRCS, SCC, and the Soil Conservation Districts will provide technical resources for development of conservation plans for individual landowners and project plans for parties developing watershed scale projects and seeking cost share funds.  
Target Date: Ongoing
- C BOR will provide technical assistance, such as water resources related planning, evaluation, and modeling; engineering design; monitoring; water quality analysis, and project construction (Congressional authorization required) on a cooperative, cost-sharing basis.  
Target Date: Ongoing
- C DEQ will respond to stakeholders in other watersheds who may want to develop trading systems.  
Target Date: Ongoing, as needed

#### *Completing the BMP List*

Completion of key program components to support agricultural involvement in trading is essential for program implementation. The SCC has agreed to provide overall coordination for this work. Major work areas include methods for calculating pretreatment load, and specific trading requirements for selected BMPs. These work tasks will be completed by the SCC and a contractor under contract to the Idaho Water User's Association as described below:

- C The SCC will prepare a report outlining the method for calculating pretreatment load from surface irrigated lands.  
Target Date: July 2000
- C The SCC will develop methods for calculating pretreatment load from irrigated pasture and animal feeding operations.  
Target Date: December 2000
- C The SCC will work with IDA, and others as appropriate, to determine an approach for calculating pretreatment load infiltrating to ground water. This work will be based, at least in part, on an IDA project to evaluate the interaction of ground and surface water with respect to nutrients in the Mason Creek watershed.  
Target Date: Preliminary study results March 2001; proposed method for calculating ground water pretreatment load, December 2001
- C The SCC will prepare a final report on sediment ponds to provide the technical basis for developing BMP list materials for sediment ponds.  
Target Date: May 2000

- C The Idaho Water User's Association contractor, in consultation with the SCC and the BMP Technical Committee, will prepare BMP list technical information for sediment ponds and six to eight additional BMPs.

Target Date: December 2000

- C The BMP Technical Committee and BMP Effectiveness Subcommittee will provide technical review of all work products prepared for the BMP list.

Target Date: Ongoing

### *Launching the Association*

- C Southwest Idaho RC&D Council will 'incubate' the Association by assisting with grant proposals and supporting initial development steps.

Target Date: Ongoing through December 2001

- C The Association Work Group will:

- recruit initial directors. Target Date: September 2000
- seek funding and file for incorporation. Target Date: September 2000
- seek funding and file for 501(c)(3) status. Target Date: September 2000

- C The SWIRC&D, in cooperation with the Association Work Group, will develop two to three proposals to private foundations for startup funding.

Target Date: September 2000

- C The SWIRC&D, in cooperation with the Association Work Group, will develop a grant application to ESRI seeking ArcView software, and possibly a computer, for the trade tracking system.

Target Date: December 2000

- C DEQ will oversee the Association's development of the trade tracking system. DEQ will establish a trade tracking system if the Association fails to do so.

Target Date: Ongoing, as needed

- C The Association Work Group will complete development of an initial trade tracking database.

Target Date: June 2001

### *Program Review and Audits*

- C EPA and DEQ will be responsible for conducting routine inspections of NPDES permitted facilities, including review of records pertaining to any trades used by a permittee.

Target Date: Consistent with existing permit inspection schedule.

- C EPA, DEQ, and the SCC will develop a formal agreement to outline responsibilities and procedures for SCC review of BMPs to support NPDES permit inspections.  
Target Date: July 2000
- C DEQ will conduct a periodic audit of the trade tracking database.  
Target Date: December 2002, December 2004, December 2006, then every five years thereafter, to coincide with the 5-year permit cycle.